

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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**CHARLES NOVINS, ESQ., P.C. and
CHARLES NOVINS, personally**

Plaintiffs

v.

**KEVIN A. CANNON, KEVIN
MICHAEL FRIES, JIM KELSO,
RHONDA LEA KIRK FRIES,
VINCENT LAMB, CARL R.
OSTERWALD, ET AL.**

Defendants

Civil Action: 3:09-CV-5354

**CROSS-MOTION FOR
SUMMARY JUDGMENT IN
PLAINTIFFS' FAVOR**

TO DEFENDANTS AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on April 4, 2011, or as soon as counsel may be heard by the Court, Plaintiffs CHARLES NOVINS, ESQ., P.C. and CHARLES NOVINS, personally, shall move before the Honorable Anne E. Thompson, in room 4000 of the United States District Court, District of New Jersey, Clarkson S. Fischer Federal Building & U.S. Courthouse, 402 E. State Street, Trenton, New Jersey, for an Order to Grant Summary Judgment in favor of Plaintiffs. Oral argument is not requested unless demanded by any adversary (and has been previously designated by the Court to be heard on the papers.) Plaintiffs will rely on the attached letter brief, attached exhibits, and other matters of record previously presented to the Court.

/S/ Charles Novins, Esq.

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of Court via ECF on March 19, 2011 (attached notice page served March 28, 2011, to correct deficiency) and served upon the following counsel of record and/or *pro se* parties:

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